

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
FIELDWOOD ENERGY LLC, <i>et al.</i>,	§	Case No. 20-33948 (MI)
	§	
Debtors.¹	§	(Jointly Administered)
	§	

**DEBTORS' WITNESS AND EXHIBIT LIST
FOR HEARING ON FEBRUARY 2, 2021**

Fieldwood Energy LLC and its debtor affiliates in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “**Debtors**”), file this witness and exhibit list (the “**Witness and Exhibit List**”) for the hearing scheduled for **February 2, 2021 at 3:00 p.m. (Prevailing Central Time)** (the “**Hearing**”):

WITNESSES

The Debtors may call any of the following witnesses at the Hearing:

1. Michael T. Dane, Senior Vice President and Chief Financial Officer, Fieldwood Energy LLC;
2. Nathan Vaughn, Deepwater Land Advisor, Fieldwood Energy LLC;
3. Venk Bhat, Subsea Project Lead, Fieldwood Energy LLC;
4. Starlee Sykes, Regional President for Gulf of Mexico and Canada, BP Exploration & Production Inc.;
5. Richard Eaton, Head of Planning & Commercial Operations, BP Exploration & Production Inc.;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, as applicable, are: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Energy LLC (6778); Fieldwood Energy Inc. (4991); Fieldwood Energy Offshore LLC (4494); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); FW GOM Pipeline, Inc. (8440); GOM Shelf LLC (8107); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422). The Debtors’ primary mailing address is 2000 W. Sam Houston Parkway S., Suite 1200, Houston, TX 77042.

6. Craig Redding, Subsea Operations Projects Lead, BP Exploration & Production Inc.;
7. Any witness called or listed by any other party; and
8. Any rebuttal witnesses.

EXHIBITS

The Debtors may offer into evidence any one or more of the following exhibits:

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
1.	Galapagos Area Loop Subsea Production System Construction and Operating Agreement, dated December 1, 2011, and all exhibits and amendments thereto ("LSPS OA")				
2.	Production Handling and Operating Services Agreement, dated September 21, 2010, and all exhibits and amendments thereto ("PHA") <i>[confidential/filed with redactions]</i>				
3.	Exhibit C to Declaration of Erin Choi [ECF No. 793, dated 01/27/21] – U.S. Department of the Interior's Order No. 3395, dated January 20, 2021 ("DOI Order") [ECF No. 793-003]				
4.	Exhibit D to Declaration of Erin Choi [ECF No. 793, dated 01/27/21] – Debtors' email to BP, dated January 21, 2021 [ECF No. 793-004]				
5.	Exhibit E to Declaration of Erin Choi [ECF No. 793, dated 01/27/21] – Debtors' Letter to BP, dated January 24, 2021 [ECF No. 793-005]				
6.	Exhibit F to Declaration of Erin Choi [ECF No. 793, dated 01/27/21] – BP's Letter to Debtors, dated January 26, 2021 [ECF No. 793-006]				
7.	Debtors' Letter to BP, dated November 3, 2020 [ECF No. 793-007]				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
8.	Exhibit H to Declaration of Erin M. Choi [ECF No. 822, dated 02/01/21] – letter, dated January 31, 2021, emailed from Greenberg Traurig, LLP to Weil, Gotshal & Manges, LLP at 10:24 a.m. CT [ECF No. 0822-001]				
9.	Exhibit I to Declaration of Erin M. Choi [ECF No. 822, dated 02/01/21] – BP’s SOP schedule, attached to an email dated January 28, 2021, sent from BP to Fieldwood at 4:34 p.m. CT [ECF No. 0822-002]				
10.	Exhibit J to Declaration of Erin M. Choi [ECF No. 822, dated 02/01/21] – email dated January 28, 2021, sent from Fieldwood to BP at 7:59 p.m. CT [ECF No. 0822-003]				
11.	Exhibit K to Declaration of Erin M. Choi [ECF No. 822, dated 02/01/21] – email dated January 29, 2021, sent from Fieldwood to BP, Red Willow Offshore, LLC (“Red Willow”), and Houston Energy Inc. (“Houston Energy”) at 4:35 p.m. CT [ECF No. 0822-004]				
12.	Exhibit L to Declaration of Erin M. Choi [ECF No. 822, dated 02/01/21] – email dated January 29, 2021, sent from Red Willow to BP, Fieldwood, and Houston Energy at 4:50 p.m. CT [ECF No. 0822-005]				
13.	Exhibit M to Declaration of Erin M. Choi [ECF No. 822, dated 02/01/21] – email dated January 29, 2021, sent from Houston Energy to BP, Fieldwood, and Red Willow at 5:05 p.m. CT [ECF No. 0822-006]				
14.	Exhibit N to Declaration of Erin M. Choi [ECF No. 822, dated 02/01/21] – email dated January 29, 2021, sent from Fieldwood to BP, Red Willow, and Houston Energy at 5:36 p.m. CT [ECF No. 0822-007]				
15.	Exhibit O to Declaration of Erin M. Choi [ECF No. 822, dated 02/01/21] – email, dated January 31, 2021, sent from Greenberg Traurig, LLP to Weil, Gotshal & Manges, LLP at 7:27 p.m. CT [ECF No. 0822-008]				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
16.	Fieldwood Energy / Santa Cruz PLEM 2 Remediation / Suggested Temporary Genovesa Tie-in & Galapagos Loop Modifications, dated 10/29/20				
17.	Any exhibit designated by any other party				
18.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases				
19.	Any exhibit necessary to rebut the evidence or testimony of any witness offered or designated by any other party				

The Debtors reserve the right to amend or supplement the Witness and Exhibit List at any time prior to the Hearing.

Dated: February 2, 2021
Houston, Texas

Respectfully submitted,

/s/ Alfredo R. Pérez

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*Attorneys for Debtors and Debtors in
Possession*

Certificate of Service

I hereby certify that on February 2, 2021, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Alfredo R. Pérez

Alfredo R. Pérez